

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION

UNITED STATES OF AMERICA

v.

HAJI SALAD

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)

NO. 3:10-260

JUDGE HAYNES

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MOTION TO EXCLUDE OR REDACT CERTAIN PHONE CALLS BASED ON  
*BRUTON V. UNITED STATES*

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COMES NOW the Defendant, Haji Salad, by and through his undersigned counsel, and hereby moves this Court to order the exclusion or redaction of certain phone calls that the Government intends to introduce to the jury, because introduction of those phone calls would amount to a violation of the rule announced by the United States Supreme Court in *Bruton v. United States*, 391 U.S. 123, 88 S.Ct. 1620, 20 L.Ed.2d 476 (1968), as will be more thoroughly explained in an accompanying memorandum of law.

Respectfully submitted,

s/ Patrick Frogge

PATRICK FROGGE, No. 20763  
BELL, TENNENT & FROGGE, PLLC  
Bank of America Plaza  
414 Union Street, Suite 904  
Nashville, Tennessee 37219  
(615) 244-1110  
(615) 244-1114 facsimile  
patrick@btflaw.com

*EXCEL*  
*Absent proof that*  
*the intercepts in the*  
*conversations were government*  
*agents or informants, the*  
*motion is DENIED. U.S.*  
*v. Frawley, 415 F.3d 537,*  
*548 (6th Cir 2009)*

*Will*  
*2/8/12*  
*3-7-12*